

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 5**

77 W. JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604-3590

EPA Region 5 Records Ctr.



299744

Reply to the Attention Of: SR-6J

September 14, 2006

**Via E-mail and Mail**

Dr. Rainer Domalski  
Rutgers Organics Corporation  
201 Struble Road  
State College, PA 16801-7488  
Fax: 814.238.1567

RE: Additional Investigatory Work for Operable Unit 3  
Nease Chemical Site, Salem, Ohio

Dear Rainer:

EPA and Ohio EPA (the Agencies) have reviewed the revised *2006 Floodplain Soil Sampling Work Plan, Middle Fork of Little Beaver Creek, Operable Unit Three, Nease Chemical Site, Salem, Ohio*, dated August 2006 (Floodplain Work Plan). The revised Floodplain Work Plan adequately addresses the Agencies' previous comments. Therefore, the Agencies are approving the Floodplain Work Plan with two modifications discussed below, and authorizing the work to proceed. As you are aware, the Ohio EPA will assist with the sampling.

Operable Unit 3 of the Nease Chemical Site is comprised of Feeder Creek and portions of the Middle Fork of Little Beaver Creek (MFLBC). Before the site was separated into operable units, considerable work had been done to characterize Feeder Creek and MFLBC. That information was presented in the approved, site-wide Remedial Investigation Report dated January 1996. Subsequently, additional investigations of the MFLBC have been conducted by Rutgers and Ohio EPA. Baring any unexpected results, the Agencies anticipate that the 2006 floodplain sampling combined with the 2005 fish, sediment, and surface water sampling will comprise the final investigations of Operable Unit 3 before the development of a Feasibility Study and proposed remedy (anticipated in 2007).

**Modifications**

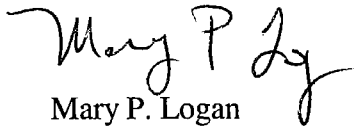
1) Sampling Locations – You have notified the Agencies that Rutgers was unable to obtain access to one of the proposed sampling locations – river mile 20.8, near Franklin Square. Based on the recent and historical sediment data adjacent to this location, and up and downstream, nearby

sediment appears to have relatively low levels of mirex. Because of the lack of access and the historical data, the Agencies will accept that sampling at this location may be skipped during implementation of the work plan.

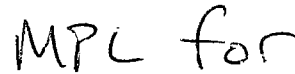
2) Sample Extraction – Based on recent discussions regarding extraction procedures, the Agencies would like the floodplain soil samples held without extraction until the issue is resolved. Therefore, the sample collection can occur on schedule, with the samples being held at the laboratory in accordance with the PDI Work Plan.

Thanks to you and your team for your efforts. The Agencies look forward to the current results from the floodplain areas, and are eager to begin discussions on potential remedies.

Please do not hesitate to contact us at the below-listed numbers if you have any questions regarding this letter or require any clarification.



Mary P. Logan  
Remedial Project Manager  
U.S EPA, Superfund Division  
(312) 886-4699



Sheila Abraham  
Site Coordinator/ES-3  
Ohio EPA, Division of Emergency and  
Remedial Response  
(330) 963-1290

cc via email: S. Finn, Golder Associates, Inc.  
S. Abraham, Ohio EPA (and hard copy)  
M. Mankowski, U.S. EPA